UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

FILED

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UNITED STATES OF AMERICA,)	I. S. DISTRICT COURT STERN DISTRICT OF M ST. LOUIS
Plaintiff, v.)) NO. S1-4:16CR00159 AGF	
LOREN ALLEN COPP, a/k/a "Sensei,"))	
Defendant.)	

SUPERSEDING INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

- Federal law defined the term:
- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- "sexually explicit conduct" to mean actual or simulated (b)
 - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oralanal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. $\S2256(2)(A)$; and
- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any

data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C.§2256(6)).

- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
 - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
- (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.
- 2. The "Internet" was, and is, a computer communications network using interstate and foreign telephone lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
- 3. Between on or about October 2009, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, "Jane Doe 1," to engage in sexually explicit conduct, specifically, LOREN ALLEN COPP produced images of "Jane Doe 1" in a lascivious display of her genitals, and engaging in sexually explicit activity and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: images of "Jane Doe 1" in a lascivious display of her genitals and engaging in sexually explicit activity, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., a camera and a Purex Technology hard drive containing a Hitachi Deskstar SATA hard drive,

Serial Number: VFG111R5EP3ZGF.

In violation of Title 18, United States Code, Section 2251(a) and 2, and punishable under Title 18, United States Code, Section 2251(e).

COUNT II

The Grand Jury further charges that:

- 1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
- 2. Between on or about January 1, 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, "Jane Doe 5," to engage in sexually explicit conduct, specifically, LOREN ALLEN COPP produced images of "Jane Doe 5" in a lascivious display of her genitals, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: images of "Jane Doe 5" in a lascivious display of her genitals, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., a camera and a Purex Technology hard drive containing a Hitachi Deskstar SATA hard drive, Serial Number: VFG111R5EP3ZGF.

In violation of Title 18, United States Code, Section 2251(a) and 2, and punishable under Title 18, United States Code, Section 2251(e).

COUNT III

The Grand Jury further charges that:

- 1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
- 2. Between on or about 2007, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did knowingly attempt to employ, use, persuade, induce, entice, and coerce minors, "Jane Doe 3" and "Jane Doe 4," to engage in sexually explicit conduct, specifically, LOREN ALLEN COPP video recorded "Jane Doe 3" and "Jane Doe 4" undressing in an attempt to video record the minors in a lascivious display of their genitals, and said conduct was for the purpose of producing a visual depiction of sexually explicit conduct, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., a video camera and Hitachi hard drive, Serial Number: CGCD7WHC.

In violation of Title 18, United States Code, Section 2251(a) and 2, and punishable under Title 18, United States Code, Section 2251(e).

COUNT IV

The Grand Jury further charges that:

- 1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
- 2. Between on or about 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did knowingly possess material that contained an image of child

pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, a Purex Technology hard drive containing a Hitachi Deskstar SATA hard drive, Serial Number: VFG111R5EP3ZGF, said hard drive having been produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to, the following:

- 1. "14499769_561585270598055_127857667_n.jpg" an image file that depicts "Jane Doe 3" and "Jane Doe 5," both minor females, in lascivious display of their genitals while standing in the bathroom known to be inside the property located at 4601 Morganford Rd.
- 2. "1360650.jpg" an image file of a male penis placed on top of a printed photo of an image which depicts "Jane Doe 5," a minor female, in a lascivious display of her genitals so that it appears that the penis would be penetrating the vagina of the minor.
- 3. "ass with pussy open.jpg" an image file of "Jane Doe 5," a minor female, in a lascivious display of her genitals.
- 4. "jkgX4TY.jpg" an image file that depicts a prepubescent minor female with her legs bound in ropes and a lascivious display of her genitals.
- 5. "042.jpg" an image file that depicts a prepubescent minor female with an adult penis penetrating her genitals.
- 6. "adfasdf.jpg" an image file that depicts a collage of images of a prepubescent minor female wearing a metal and black spiked collar in lascivious display of her genitals and with an adult male penis touching her mouth, penetrating her vagina and appearing to penetrate her anus while the minor is depicted crying.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B).

COUNT V

The Grand Jury further charges that:

Between on or about January 8, 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did knowingly persuade, induce, entice and coerce "Jane Doe 3," who defendant believed to be a minor, to engage in sexual activity for which any person can be charged with a criminal offense, to wit: the defendant, knowingingly coerced or induced "Jane Doe 3," who was known by the defendant to be less than fifteen (15) years of age, to expose the breasts of a female child through the internet or other electronic means for the purpose of arousing or gratifying the sexual desire of any person, including the child, in violation of Missouri Revised Statute, Section 566.083, which is in violation of Title 18, United States Code, Section 2422(b).

COUNT VI

The Grand Jury further charges that:

Between on or about January 8, 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did knowingly persuade, induce, entice and coerce "Jane Doe 5," who defendant believed to be a minor, to engage in sexual activity for which any person can be charged with a criminal offense, to wit: the defendant, knowingingly coerced or induced "Jane Doe 5," who was known by the defendant to be less than fifteen (15) years of age, to expose the breasts of a female child through the internet or other electronic means for the purpose of

arousing or gratifying the sexual desire of any person, including the child, in violation of Missouri Revised Statute, Section 566.083, which is in violation of Title 18, United States Code, Section 2422(b).

COUNT VII

The Grand Jury further charges that:

Between on or about January 8, 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did use any facility and means of interstate commerce with the intent to transmit the name of "Jane Doe 1," who had not attained the age of sixteen (16), and the defendant did so with the intent to entice and encourage "Jane Doe 1" to engage in sexual activity, in violation of Missouri Revised Statute, Section 566.083, and in violation of Title 18, United States Code, Section 2425.

COUNT VIII

The Grand Jury further charges that:

Between on or about January 8, 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did use any facility and means of interstate commerce with the intent to transmit the name of "Jane Doe 3," who had not attained the age of sixteen (16), and the defendant did so with the intent to entice and encourage "Jane Doe 3" to engage in sexual activity, in violation of Missouri Revised Statute, Section 566.083, and in violation of Title 18, United States Code, Section 2425.

COUNT IX

The Grand Jury further charges that:

Between on or about January 8, 2013, and on or about October 15, 2015, in the Eastern District of Missouri, and elsewhere,

LOREN ALLEN COPP a/k/a "Sensei,"

the defendant herein, did use any facility and means of interstate commerce with the intent to transmit the name of "Jane Doe 5," who had not attained the age of sixteen (16), and the defendant did so with the intent to entice and encourage "Jane Doe 5" to engage in sexual activity, in violation of Missouri Revised Statute, Section 566.083, and in violation of Title 18, United States Code, Section 2425.

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CARRIE COSTANTIN
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